

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE: §  
§  
DHILLON GROUP, LLC, § CASE NO. 12-40163-btr  
§  
DEBTOR. § CHAPTER 11

**UNITED CENTRAL BANK'S OPPOSITION TO APPLICATION FOR FINAL DECREE**

Creditor UNITED CENTRAL BANK ("UCB") hereby objects at this time to Debtor's Application for Final Decree filed on March 7, 2013 [Docket No. 186] and submits the following:

1. On June 26, 2012, this Court entered an Order confirming the Debtor's Plan of Reorganization, and on March 7, 2013, Debtor filed its Application.
2. Fed. R. Bankr. Proc. 3022 states that "After an estate is fully administered in a Chapter 11 reorganization case, the court on its own motion or on motion of a party of interest, shall enter a final decree closing the case."
3. UCB asserts the case is not fully administered as there is a pending adversary proceeding which has not been fully resolved. Therefore, a final decree is premature.
4. UCB submits a final decree cannot be entered as the pending adversary proceeding concerning the insurance proceeds filed on February 6, 2012 assigned Case No. 12-04022 and styled *Security National Insurance Company v. Dhillon Group, LLC, United Central Bank, et al.*, has not been fully and finally resolved.
5. Further, UCB asserts that insurance monies were improperly paid by Security National Insurance Company ("Security") directly to the Debtor when UCB was named as a loss payee. Upon information and belief, Security asserts that Debtor misrepresented to Security that there was no mortgage on the Hotel. UCB anticipates that Security will assert a claim against Debtor for those monies sought by UCB.

Accordingly, UCB respectfully requests that Debtor's Application for Final Decree be denied until such adversary matters have been fully resolved, and for such other and further relief to which it may be entitled.

JONES, ALLEN & FUQUAY, L.L.P.  
8828 Greenville Avenue  
Dallas, Texas 75243  
(214) 343-7400 (Telephone)  
(214) 343-7455 (Facsimile)

By: /s/ Laura L. Worsham  
Laura L. Worsham  
State Bar No. 22008050  
Nathan Allen, Jr.  
State Bar No. 01071000

ATTORNEYS FOR UNITED CENTRAL BANK

**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2013, a copy of the foregoing was served via e-mail or by this Court's electronic notice on the following parties, as follows:

Ms. Joyce Lindauer  
*Counsel for Debtor*  
8140 Walnut Hill Lane, Suite 301  
Dallas, TX 75231

Mr. John M. Vardeman  
*U.S. Trustee*  
110 N. College Ave., Suite 300  
Tyler, TX 75702

/s/ Laura L. Worsham  
Laura L. Worsham